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8
9 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 Alberto Mpiana Da Mesquita E Melo,

11 Plaintiff,

12 v.

13 U.S. Citizenship and Immigration Services
(USCIS), et al.,

14 Defendant.
15

Case No. 2:24-cv-01030-JAD-EJY

**Joint Stipulation and Order to
Stay the Proceedings (Fourth
Request) until March 7, 2025**

ECF No. 23

16 Plaintiff and Defendants, through their undersigned counsel, hereby stipulate and
17 jointly request that the Court stay all deadlines in this matter and hold this case in abeyance
18 for an additional period of 30 days, or until **March 7, 2025**.

19 The parties have conferred, and they may resolve this matter without continued
20 litigation. The subject of this litigation concerns Plaintiff's I-485 application for adjustment
21 of status and I-601 application for waiver of grounds of inadmissibility. Plaintiff asserts
22 Defendants have unduly delayed the processing of his I-485 and I-601 applications.

23 Since the last stay was granted, Defendants conducted an inquiry regarding a
24 potential parole for Plaintiff. The inquiry currently requires the involvement of Plaintiff and
25 his counsel. The parties are also discussing other potential administrative solutions to
26 resolve this matter without continued litigation. The parties thus request an extension of
27 the stay to allow discussions regarding a potential parole and other administrative solutions
28 to conclude. Pending these discussions, this litigation may become moot.

1 This is the fourth request to stay the proceedings. This request is not sought for
2 purposes of delay or any other improper purpose, but to facilitate the parties' efforts to
3 resolve the matter in a "just, speedy, and inexpensive" manner consistent with Fed. R. Civ.
4 P. 1. The parties reserve the ability to seek additional time to finalize resolution, if
5 necessary.

6 Respectfully submitted this 6th day of February 2025.

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8 SULL & ASSOCIATES, PLLC.

9 /s/ Hardeep Sull

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25 Based on the parties' stipulation [ECF No. 23] and good cause appearing, IT
26 IS ORDERED that **this case is STAYED through March 7, 2025.**

27
28
29 
30 United States District Judge

2/6/25

DATED: _____